



LTR/P02941/11/DS

21 July 2010

Mrs L Freeland
Programme Officer
c/o Ashford Borough Council
Civic Centre
Tannery Lane
Ashford
Kent
TN23 1PL

Dear Mrs Freeland

**Tenterden and Rural Areas DPD: Post Hearing Consultation
Response on behalf of Stour Valley Estates Ltd**

I am writing in response to the Inspector's invitation to comment on the effect of recent policy changes at national level on the policies and content of the Tenterden and Rural Areas DPD. The inspector highlighted three issues in her letter, the revocation of the regional spatial strategy, the changes to the classification of garden land and amendments to PPS 3 relating to housing densities.

My client considers that the revocation of the Regional Spatial Strategy has no adverse impact on the identification of the Chilham Sawmills site for housing development. This view is based on two principal grounds:

- The South East Plan identified the total housing requirement for Ashford district as 22,700 dwellings up to 2026. This figure was firmly based on previous strategic policies which identified Ashford as a major growth point in East Kent and as the location for major housing growth. This overall scale of housing growth remains part of the development plan targets for Ashford district set out in the Ashford Core Strategy which identifies the provision of 16,770 dwellings over a plan period to 2021. If this figure is rolled forward to 2026 and assuming an annual completion rate of 1135 this would deliver 22445 units by 2026. There is therefore no material difference in housing targets between the adopted Core Strategy and the now revoked South East Plan.
- Ashford Borough Council is a planning authority which is fully committed towards fulfilling its objectives as a major growth point in Kent and it did not raise concerns over the housing targets set out in the South East Plan. The acknowledgement of the authority's role is one which has the full commitment of the elected members and the local community and there is little, if any, prospect of the authority revising its housing

chartered planning and development consultants

David Stewart *B.Sc(Hons), Dip TP, Cert in Env Assessment, MRTPI*
Jeanne Taylor *Dip TP, MRTPI*
Associate: Karen Banks *BA(Hons), PG Dip, MRTPI*

Lee Evans Planning, St John's Lane, Canterbury, Kent. CT1 2QQ
Tel: 01227 784444 Fax: 01227 819102

email: townplanning@lee-evans.co.uk website: www.lee-evans-planning.co.uk

Registered N° OC304363

targets beyond 2021 to below the figures set out in the South East Plan. We are sure that the planning authority itself will wish to comment on this matter.

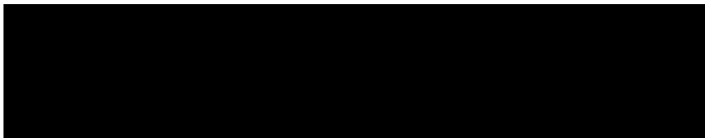
In the light of the factors set out above and the committed housing targets set out in the Core Strategy it is clear that the housing targets set out in the Tenterden and Rural Areas DPD accords with the current development plan and that there is little prospect of those targets being reduced without a major review of the Core Strategy which is not due to take place until 2014 at the earliest. We therefore consider that the housing allocations within the DPD are sound. My client also believes that even if housing targets were to be reduced his site should be considered for development in advance of the major greenfield allocations at Tenterden because the Chilham sawmills site is previously developed land.

The reclassification of garden land and its removal from the status of being previously developed land has no impact on the allocation of my client's land. If there is an impact it will be to reduce the amount of small windfall sites coming forward within the district over the plan period and placing greater pressure on allocated sites to meet housing needs.

The final change that the government has made relates to the removal of minimum 30 dwellings per hectare density in PPS 3. It should firstly be recognised that even though this figure has been removed from national policy there is still the need to make the best and most efficient use of land as set out in both PPS 1 and PPS3. However it does allow planning authorities to consider development proposals against the setting and context of each individual site and, where appropriate, procure a development which is of a sympathetic character to its surroundings. We believe that it is no different to the process of assessment of any development of my client's site under the current regime of policies. There were no third-party objection is to either the principle of development or the indicative numbers that were identified in the draft document and given the extent of community backing to the project we believe that the development of my client site for a housing development in the order of the 30 or more houses is acceptable. No evidence was presented which indicated that it would introduce a development which was over intensive or out of keeping with its setting.

Who would be grateful if the inspector would give consideration to these matters.

Yours sincerely



David Stewart
Partner